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William B. Nickol
927 Bergen Court
Bel Air, Maryland 21014
September 30, 1997

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FCC MAIL ROOM

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Subject: WT Docket No. 97- 153 - RM 8734

Dear Mr. Caton:

In response to your Notice of Proposed Rule Making dated August 25, 1997, I wish to express my strong and unqualified support for the above proposed amendment to Part 90 of FCC's rules concerning Private Land Mobile Radio (PLMR) Services. I have no financial interest in the outcome of this NPRM; I write to you only as a concerned motorist and a professional public safety employee.

I bring to this issue what I believe to be a unique, multi-faceted perspective. For 28 years I have been a licensed Maryland driver, and I hold a Class AM Commercial Driver's License. I have driven, in that time, every sort of wheeled conveyance imaginable, from motorcycles and sub-compact cars, to school busses and tractor trailers. In the past year, I have driven about 23000 miles in my automobile and about 8000 miles on my motorcycle.

I am a member of the National Motorists Association, the American Motorcyclist Association, and ABATE of Maryland. I have had a longtime interest in highway safety, and have been involved politically in related legislative and regulatory issues for more than 20 years. In the past 17 years, I have done some free-lance writing on the broad subject of highway safety as well.

Since 1974, I have been a professional firefighter, employed by the Baltimore City Fire Department. (Please note that while my professional experience forms part of the basis for my comments on this issue, I write to you only as a private citizen, and I do not speak for the agency which employs me.) In my career, I have driven a wide variety of emergency vehicles, from ambulances and automobiles to fire engines and ladder trucks. I am currently a lieutenant assigned to an engine company in southeast Baltimore, adjacent to several interstate highways.

During the course of my career, it has often been my experience that motorists either fail to react at all, or react inappropriately, to the approach of a responding emergency vehicle. While both common sense and the law in this state require one to pull over and stop in such a circumstance, that does not happen very often. When responding on urban and suburban roads and streets, I've noted that some motorists will slow down, some will actually speed up to try to outrun the emergency vehicle, and still others will simply slam on their brakes, forcing the emergency vehicle's driver to take quick evasive action to avoid a collision. While some of this behavior is the result of willful disobedience

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of the law, much of it, I believe, is caused by the inability of motorists to hear approaching emergency vehicles until they are in very close proximity.

For many years, I and others in my profession have wished there was some way to warn motorists of approaching emergency vehicles, far enough in advance that they could take appropriate safe action. Existing warning systems, by themselves, are insufficient. Our emergency lights must be seen to be detected, and our audible warnings — either a mechanical or electronic siren and airhorns — cannot penetrate the well-insulated interior of many modern automobiles until we are in very close proximity. In an age of serenely quiet auto interiors and high-powered stereos, we are using the same audible warning devices we have been using for more than fifty years.

The Safety Warning System (SWS) represents a new and innovative approach to this problem. Millions of American motorists, myself included, use radar detectors in their automobiles. With the SWS, those radar detectors can now serve to warn of the approach of an emergency vehicle, and provide the driver with enough time to react appropriately and safely. The system's capability, as I understand it, is so flexible it can even provide specific instructions to message recipients. The SWS, in my considered opinion, clearly has the potential to save lives, both by preventing collisions between emergency and civilian vehicles, and by enabling emergency vehicles to reach their destinations quicker.

Your approval of RM-8734 will speed the development and implementation of the Safety Warning System, thereby greatly enhancing the safety both of American motorists, and the public safety professionals who are sworn to protect them. Therefore, I respectfully request that you approve this proposed amendment, and I thank you for your kind attention to my comments.

Sincerely yours,

A handwritten signature in cursive script, reading "Giffen B. Nickol". The signature is fluid and elegant, with a large, sweeping "G" and a long, horizontal flourish at the end.

Giffen B. Nickol
Telephone: 410-893-3170